

CANAL BARGE COMPANY

5. Safety Meeting Guides

CANAL BARGE COMPANY
835 Union Street
New Orleans, LA 70112
Ph: (504) 581-2424, Fx: (504) 584-1529

December 18, 2008

TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit For Discharges**

On December 18, 2008 the U.S. Environmental Protection Agency (EPA) plans to issue the final permit governing vessel discharges incidental to the normal operation of commercial marine vessels in U.S. waters. This action is in response to a federal court ruling that found the long-standing EPA blanket exemption of commercial vessels from Clean Water Act requirements does not meet regulatory requirements. The Vessel General Permit (VGP) provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

- | | |
|--|---|
| <input type="checkbox"/> Bilge water | <input type="checkbox"/> Rudder bearing lubrication |
| <input type="checkbox"/> Deck wash down and run-off | <input type="checkbox"/> Ballast water |
| <input type="checkbox"/> Cathodic protection (anodes) | <input type="checkbox"/> Anti-fouling leachate from hull coatings |
| <input type="checkbox"/> Elevator pit effluent (retractable pilot house vessels) | <input type="checkbox"/> Fire main systems |
| <input type="checkbox"/> Gray water | <input type="checkbox"/> Refrigeration and air condensate |

Canal Barge Company has a long history of commitment to environmental stewardship. We know that our waterways are national resources that are to be protected and preserved. We understand the need to work hard to eliminate environmental incidents, reduce waste and emissions and manage environmental risk. The EPA Vessel General Permit is a tool we can use to become better environmental stewards.

Attached to this message you will find two documents: (1) The December Safety Meeting Guide and (2) the Draft VGP Weekly Vessel Inspection Checklist along with instructions. Print and review the documents. Plan to conduct a safety meeting by December 19, 2008. Conduct your first weekly inspection before December 26, 2008 and at one-week intervals thereafter. Maintain vessel inspection records filed on board until further notice.

Please use this material to hold a safety meeting with your crew. **As noted in the instructions, please communicate with your relief to ensure that all crewmembers on your vessel participate in this important training.** Upon completion of this training session with your crew, please record this important activity in your Turnover Report and request that your relief conduct the same training with the oncoming crew.

PROTECTING THE ENVIRONMENT IS GOOD BUSINESS


Captain Paul Barnes

Attachments

- (1) Safety Meeting Guide—Vessel General Permit For Discharges
- (2) Environmental Sensitivities Policy
- (3) VGP Weekly Vessel Inspection Checklist
- (4) Exhibit I – EPA Vessel General Permit – CBC Onboard Best Management Practices
- (5) Safety Meeting Follow-Up Form

CANAL BARGE COMPANY
SAFETY MEETING GUIDE
Vessel General Permit For Discharges

This package includes:

- (1) Instructions
- (2) Script
- (3) Copy of Environmental Sensitivities Policy
- (4) VGP Weekly Vessel Inspection Checklist
- (5) Safety Meeting Follow-Up

NOTE! This guide and all the material it contains should be considered suggestions and helpful hints to assist you in conducting your vessel safety meeting. Always feel free to use your own words or description of the material about the subject of this guide.

Steps to take before beginning the Safety Meeting:

- Make sure all the materials listed above are included in this package
- Please review the material before conducting the meeting
- Review CBC Environmental Sensitivities Policy
- Review CBC Onboard Best Practices
- Review VGP Weekly Vessel Inspection Checklist
- Use the Lesson Plan outline as a guide
- Ask questions to involve the crew and to assess understanding
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues

Once you have completed the meeting:

- Write down any suggestions or opinions
- Retain the Safety Meeting Guide for future reference
- Complete the Safety Meeting Follow-Up Form and return it to the Belle Chasse Office
- Make an entry in the Lydia vessel log describing date, time and topic covered during the Safety Meeting
- Record the training in your Turnover Report and request your relief to complete the same training with the oncoming crew

Note: Please Contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

OBJECTIVES

When they have completed this lesson the crew should be able to:

- Define and reinforce CBC's Environmental Sensitivities Policy
- Understand the requirements of the Weekly Vessel Inspection Checklist
- Be able to explain the requirements of the weekly/voyage routine vessel inspection which include:
 - Are decks clear of trash or debris that may blow or wash overboard?
 - Is any oil or pollutant visible on deck that could be washed overboard?
 - Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on the deck?
 - Is trash onboard secure and bagged and stowed to prevent being blown or washed overboard?
 - Are all scuppers in place to prevent overboard discharge of oily run off?
 - Are fuel vents secure and properly contained to prevent overboard discharge?
 - Is fuel containment properly in place to prevent fuel or oil from going overboard?
 - Is the vessel using best management practices to ensure minimum 'Gray Water' overboard discharge?
 - Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate free?
 - Are toxic and hazardous materials properly stored in protected areas of the vessel?
 - Are rudder-bearing seals in good operating order?
 - Is the deck area where rigging is stowed free of oily residue?
 - During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?

INSTRUCTOR TO READ TO THE CREW

This Safety Meeting will explain the December 18, 2008 change in U.S. Environmental Protection Agency (EPA) plans to issue a final permit governing vessel discharges incidental to the normal operation of commercial marine vessels in U.S. waters. This action is in response to a federal court ruling which found that the long-standing EPA blanket exemption of commercial vessels from Clean Water Act requirements does not comply with regulatory requirements. The Vessel General Permit (VGP) provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The vessel discharges covered by the VGP are listed in the cover memo and may occur in our vessel operations.

CBC's position as a leader in environmental sensitivities in the barge and towing industry can be further strengthened when each employee consistently embraces and exercises the principles of our Environmental Sensitivities Policy. Only if each of us makes the commitment to support the ideas and principles contained in this change in regulations can we fulfill our commitment to protecting the environment. We believe that our unique way of doing business, which is based upon a partnership between CBC and our employees, will ensure that the Company and all employees take the steps necessary to continue to reduce environmental hazards and eliminate environmental incidents.

Please note that some of the VGP's requirements for environmental controls, vessel inspections, corrective actions and recordkeeping may overlap with practices we have already implemented as part of RCP, our safety management system. Going forward we will work to incorporate the VGP's requirements into our existing safety management system instead of establishing new policies and procedures or documentation systems. Our goal is to make sure that we clearly understand and can identify requirements imposed by the permit so that you can readily demonstrate to the EPA (or an authorized agent of EPA) that our vessels are in compliance with the VGP.

CBC's commitment to environmental stewardship runs throughout our organization. We should continually work to eliminate environmental incidents and reduce wastes. All CBC employees are responsible for supporting CBC's Environmental Sensitivities Policy.

As stated in our Environmental Sensitivities Policy, our commitment to continually improve our environmental performance is as follows:

- Environmental protection is a priority in our business planning and operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state, and local regulations governing environmental protection is a condition of employment
- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

WE OBEY THE LAW. Canal Barge is committed to obeying all environmental, safety, and health laws and regulations. This commitment helps protect our employees, our customers, our suppliers, our community, and our environment. We welcome your ideas on how we can better work together to improve our working relationship with nature.

SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
The waterways of the United States are a shared resource and national asset for everyone.
Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

Weekly Routine Vessel Inspection Checklist

Vessel Name: _____

Person Conducting inspection: _____

Vessel Location: _____

Weekly or Once per Voyage (Whichever is more Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secure and bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily run off?		
Are fuel vents secure and properly contained to prevent overboard discharge?		
Is fuel containment properly in place to prevent fuel or oil from going overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel has been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

Description of any Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Onboard Safety Meeting Record
Meeting Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: ____/____/____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing Date, Time, and Training Topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Did you conduct your first weekly inspection before December 26, 2008? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records on board your vessel? ☐ Yes ☐ No

Describe Crew Best Practices for Souging the Boat

Describe any Lessons Learned and their Review

Any Comments or Suggestions Concerning the Safety Meeting Guide and Lesson Materials (Include any comments on No answers here)

Personnel Attending Meeting (I, the undersigned, have thoroughly read the revised Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal to eliminate all accidents and environmental incidents is achieved.)

_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____
Print Name Signature

Canal Barge Company
Onboard Safety Meeting Record
Meeting Topic: Vessel General Permit For Discharges

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Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Did you conduct your first weekly inspection before December 26, 2008? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records on board your vessel? ☐ Yes ☐ No

Describe Crew Best Practices for Souging the Boat

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_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____
Print Name Signature

CANAL BARGE COMPANY, INC.

ENVIRONMENTAL SENSITIVITIES POLICY

CBC's commitment to environmental stewardship runs throughout the organization. We recognize that the waterways we travel are shared, public resources to be preserved and passed on to future generations. We work continually to eliminate all environmental incidents, reduce wastes and reduce and/or manage environmental risks and hazards. All CBC employees are responsible for supporting CBC's environmental policy. Our commitment to continually improve CBC's environmental performance is as follows:

- We will conduct our business in a manner that protects the environment, our employees, our customers, our suppliers, and the public.
- Environmental protection is a priority in our business strategy and daily operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We will train our employees to work safely and adhere to all applicable environmental policies and regulations.
- We will maintain and update emergency response plans to ensure maximum preparedness to respond to environmental incidents.
- We will strive to reduce vessel-generated waste and emissions by improving our operating procedures.
- We will work in partnership with our customers and suppliers to enhance the safe transportation of produce and the management of cargo residues and cleaning wastes associated with the transportation of all cargoes.
- We will actively collaborate with governmental authorities and other stakeholders in creating responsible environmental policies and procedures.
- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
- We will continue to monitor, evaluate and report on our performance as environmental stewards.

Everyone must be involved in order for us to be successful. Environmental protection is a priority in everything we do. We refuse to take shortcuts in our quest to be effective environmental stewards, even when this may require short-term economic sacrifice.

Environmental Stewardship Is Good Business!



Merritt Lane, III

Exhibit I

EPA VESSEL GENERAL PERMIT

CBC ONBOARD BEST MANAGEMENT PRACTICES (BMP)

1. Material Storage (VGP section 2.1.1.)

- Store cargoes and other onboard materials to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or surface water spray. If possible, store such materials in a covered place.
- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept it into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

- Maintain the protective hull seal on rudder bearings in good operating order to prevent the leaking of lubricating oil.
- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercom lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

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CANAL BARGE COMPANY
835 Union Street
New Orleans, LA 70112
Ph: (504) 581-2424, Fx: (504) 584-1529

December 3, 2009

TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit For Discharges**

As you will recall from our training at the 2009 VOW's and VEW's , in December 2008 the U.S. Environmental Protection Agency (EPA) issued the final permit governing vessel discharges incidental to the normal operation of commercial marine vessels in U.S. waters. This action is in response to a federal court ruling that found the long-standing EPA blanket exemption of commercial vessels from Clean Water Act requirements does not meet regulatory requirements. The Vessel General Permit (VGP) provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

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Attached to this training guide you will find two documents: (1) A Safety Meeting Guide and (2) the VGP Weekly Vessel Inspection Checklist along with instructions. On your desktop computer please print and review the documents. Plan to conduct the training session in December 2009. Continue to conduct your weekly inspections and continue to maintain vessel inspection records on board until further notice.

Please use this material to hold a training session meeting with your crew. **As noted in the instructions, please communicate with your relief to ensure that all crewmembers on your vessel participate in this important training. Upon completion of this training session with your crew, please record this important activity in your Turnover Report and request that your relief conduct the same training with the oncoming crew.**

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- Write down any suggestions or opinions
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Note: Please Contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

OBJECTIVES

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- Understand the requirements of the Weekly Vessel Inspection Checklist
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- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

WE OBEY THE LAW. Canal Barge is committed to obeying all environmental, safety, and health laws and regulations. This commitment helps protect our employees, our customers, our suppliers, our community, and our environment. We welcome your ideas on how we can better work together to improve our working relationship with nature.

SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
The waterways of the United States are a shared resource and national asset for everyone.
Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

Weekly Routine Vessel and Tow Inspection Checklist

Vessel Name: _____

Person Conducting inspection: _____

Vessel Location: _____

Barges In Tow: _____

Weekly or Once per Voyage (Whichever is more Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secure and bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily run off?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel and tow been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

Description of any Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Onboard Safety Meeting Record
Meeting Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: ____/____/____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing Date, Time, and Training Topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection, part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records on board your vessel? ☐ Yes ☐ No

Describe Crew Best Practices for Souging the Boat

Describe any Lessons Learned and their Review

Any Comments or Suggestions Concerning the Safety Meeting Guide and Lesson Materials (Include any comments on No answers here)

Personnel Attending Meeting (I, the undersigned, have thoroughly read the revised Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal to eliminate all accidents and environmental incidents is achieved.)

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Meeting Conducted by: _____

Print Name

Signature

Canal Barge Company
Onboard Safety Meeting Record
Meeting Topic: Vessel General Permit For Discharges

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Date: ____/____/____
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Meeting Conducted by: _____
Print Name Signature

CANAL BARGE COMPANY, INC.

ENVIRONMENTAL SENSITIVITIES POLICY

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- Environmental protection is a priority in our business strategy and daily operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
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- We will work in partnership with our customers and suppliers to enhance the safe transportation of produce and the management of cargo residues and cleaning wastes associated with the transportation of all cargoes.
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- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
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Everyone must be involved in order for us to be successful. Environmental protection is a priority in everything we do. We refuse to take shortcuts in our quest to be effective environmental stewards, even when this may require short-term economic sacrifice.

Environmental Stewardship Is Good Business!



Merritt Lane, III

Exhibit I

EPA VESSEL GENERAL PERMIT

CBC ONBOARD BEST MANAGEMENT PRACTICES (BMP)

1. Material Storage (VGP section 2.1.1.)

- Store cargoes and other onboard materials to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or surface water spray. If possible, store such materials in a covered place.
- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept it into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

- Maintain the protective hull seal on rudder bearings in good operating order to prevent the leaking of lubricating oil.
- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercom lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

CANAL BARGE COMPANY

DATE: December 14, 2010
TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit for Discharges**

As you know, since February 2009, CBC has complied with the U.S. Environmental Protection Agency's (EPA) Vessel General Permit (VGP) for discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

- | | |
|--|--|
| <input type="checkbox"/> Bilge water | <input type="checkbox"/> Rudder bearing lubrication |
| <input type="checkbox"/> Deck wash down and run-off | <input type="checkbox"/> Ballast water |
| <input type="checkbox"/> Cathodic protection (anodes) | <input type="checkbox"/> Anti-fouling leachate from hull coatings |
| <input type="checkbox"/> Elevator pit effluent (retractable pilot house vessels) | <input type="checkbox"/> Fire main systems |
| <input type="checkbox"/> Gray water | <input type="checkbox"/> Refrigeration and air conditioning condensate |

Attached to this training guide you will find two documents: (1) A Safety Meeting Guide and (2) the VGP Weekly Vessel Inspection Checklist along with instructions. On your desktop computer please print and review the documents, and plan to do the following in December 2010:

- Use this material to hold a safety meeting with your crew.
- Upon completion of safety meeting, retain a copy of this meeting guide, including the Follow-Up form, and record this activity in your Turnover Report.
- **All Deck Department employees should record the meeting in their DAR.**
- **Communicate with your relief that s/he must also conduct the VGP safety meeting training session with his/her crew to ensure that all crew members on the vessel participate in this important training.**
- Continue to conduct VGP weekly inspections and maintain vessel inspection records on board until further notice.

Please remind your crewmembers to stay focused on their safety performance. Our goal is the elimination of all incidents and accidents.

PROTECTING THE ENVIRONMENT IS GOOD BUSINESS



Captain Paul Barnes

Attachments

- (1) Safety Meeting Guide—Vessel General Permit For Discharges
- (2) Environmental Sensitivities Policy
- (3) VGP Weekly Vessel Inspection Checklist
- (4) Exhibit I – EPA Vessel General Permit – CBC Onboard Best Management Practices
- (5) Safety Meeting Follow-Up Form

CANAL BARGE COMPANY
VESSEL SAFETY MEETING GUIDE
VESSEL GENERAL PERMIT FOR DISCHARGES

This package includes:

- (1) Instructions
- (2) Script
- (3) Copy of Environmental Sensitivities Policy
- (4) VGP Weekly Vessel Inspection Checklist
- (5) Safety Meeting Follow-Up

NOTE! This guide and all the material it contains should be considered suggestions and helpful hints to assist you in conducting your vessel safety meeting. Always feel free to use your own words or description of the material about the subject of this guide.

Steps to take before beginning the Safety Meeting:

- Make sure all the materials listed above are included in this package.
- Review the material before conducting the meeting.
- Review CBC Environmental Sensitivities Policy.
- Review CBC Onboard Best Practices.
- Review VGP Weekly Vessel Inspection Checklist.
- Use the Lesson Plan outline as a guide.
- Ask questions to involve the crew and to assess understanding.
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues.

Once you have completed the meeting:

- Write down any suggestions or opinions.
- Retain the Safety Meeting Guide for future reference.
- **Complete the Safety Meeting Follow-Up Form and return it to the Belle Chasse Office.**
- **Make an entry in the vessel log describing date, time and topic covered during the Safety Meeting.**
- **Record the training in your Turnover Report and request that your relief complete the same training with the oncoming crew.**

Note: Please contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

VESSEL GENERAL PERMIT FOR DISCHARGES

OBJECTIVES

When your crew has completed this safety meeting they should be able to:

- Define and reinforce CBC's Environmental Sensitivities Policy.
- Understand the requirements of the Weekly Vessel Inspection Checklist.
- Be able to explain the requirements of the weekly/voyage routine vessel inspection, which includes:
 - Are decks clear of trash or debris that may blow or wash overboard?
 - Is any oil or pollutant visible on deck that could be washed overboard?
 - Are all materials on deck stored to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on the deck?
 - Is trash onboard secured or bagged and stowed to prevent it from being blown or washed overboard?
 - Are all scuppers in place in primary containment areas to prevent overboard discharge of oily runoff?
 - Are fuel vents secure and properly contained to prevent overboard discharge?
 - Is fuel containment properly in place to prevent fuel or oil from going overboard?
 - Is the vessel using best management practices to ensure minimum 'Gray Water' overboard discharge?
 - Does the vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate free?
 - Are toxic and hazardous materials properly stored in protected areas of the vessel?
 - Are rudder-bearing seals in good operating order?
 - Is the deck area where rigging is stowed free of oily residue?
 - During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?

INSTRUCTOR TO READ TO THE CREW

This Safety Meeting will review the requirements of the Environmental Protection Agency's Vessel General Permit, or VGP, governing discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The vessel discharges covered by the VGP are listed in the cover memo and may occur in our vessel operations.

CBC's position as a leader in environmental protection in the barge and towing industry can be further strengthened when each employee consistently embraces and exercises the principles of our Environmental Sensitivities Policy. Only if each of us makes the commitment to support the ideas and principles contained in the policy can we fulfill our commitment to protecting the environment. We believe that our unique way of doing business, which is based on a partnership between CBC and our employees, will ensure that the company and all employees take the steps necessary to continue to reduce environmental hazards and eliminate environmental incidents.

Please note that because some of the VGP's requirements for environmental controls, vessel inspections, corrective actions and recordkeeping overlap with practices we have already implemented as part of RCP, we have incorporated those overlapping requirements into our existing safety management system instead of establishing new policies. Our goal is to make sure that we clearly identify requirements imposed by the permit so that you can readily demonstrate to the EPA (or an authorized agent of EPA) that our vessels are in compliance with the VGP, if asked.

CBC's commitment to environmental stewardship runs throughout our organization. We should continually work to eliminate environmental incidents and reduce wastes. All CBC employees are responsible for supporting CBC's Environmental Sensitivities Policy.

As stated in our Environmental Sensitivities Policy, our commitment to continually improve our environmental performance is as follows:

- Environmental protection is a priority in our business planning and operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

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4 of 7

Weekly Routine Vessel and Tow Inspection Checklist

Vessel Name: _____

Person Conducting Inspection: _____

Vessel Location: _____

Barges in Tow: _____

Weekly or Once Per Voyage (Whichever Is More Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secured or bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily runoff?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
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Description of any
Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing date, time, and training topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for souging (washing) the boat:

Describe any lessons learned and if their review:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel Attending Meeting (I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.)

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Meeting Conducted by: _____
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_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

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Merritt Lane, III

Exhibit I

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- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept it into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

- Maintain the protective hull seal on rudder bearings in good operating order to prevent the leaking of lubricating oil.
- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercon lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

CANAL BARGE COMPANY

DATE: December 15, 2011
TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit for Discharges**

Since February 2009, CBC has complied with the U.S. Environmental Protection Agency's (EPA) Vessel General Permit (VGP) for discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

- | | |
|--|--|
| <input type="checkbox"/> Bilge water | <input type="checkbox"/> Rudder bearing lubrication |
| <input type="checkbox"/> Deck wash down and run-off | <input type="checkbox"/> Ballast water |
| <input type="checkbox"/> Cathodic protection (anodes) | <input type="checkbox"/> Anti-fouling leachate from hull coatings |
| <input type="checkbox"/> Elevator pit effluent (retractable pilot house vessels) | <input type="checkbox"/> Fire main systems |
| <input type="checkbox"/> Gray water | <input type="checkbox"/> Refrigeration and air conditioning condensate |

Attached to this training guide you will find two documents: (1) A Safety Meeting Guide and (2) the VGP Weekly Vessel Inspection Checklist along with instructions.

- Use this material to hold a safety meeting with your crew.
- Upon completion of safety meeting, retain a copy of this meeting guide, including the Follow-Up form, and record this activity in your Turnover Report.
- **All Deck Department employees should record the meeting in their DAR.**
- **Communicate with your relief that s/he must also conduct the VGP safety meeting training session with his/her crew to ensure that all crew members on the vessel participate in this important training.**
- Continue to conduct VGP weekly inspections and maintain vessel inspection records on board until further notice.

Being familiar with Chapter 2 Environmental Protection of the CBC Operations and Policies and Procedures Manual are examples of the Safety Procedures each employee should follow. Being familiar with policies and procedures is also a requirement of the RCP, our Safety Management System and federal regulations.

Please remind your crewmembers to stay focused on their safety performance. Our goal is the elimination of all incidents and accidents.

PROTECTING THE ENVIRONMENT IS GOOD BUSINESS



Captain Paul Barnes

Attachments

- (1) Safety Meeting Guide—Vessel General Permit For Discharges
- (2) Environmental Sensitivities Policy
- (3) VGP Weekly Vessel Inspection Checklist
- (4) Exhibit I – EPA Vessel General Permit – CBC Onboard Best Management Practices
- (5) Safety Meeting Follow-Up Form

CANAL BARGE COMPANY
VESSEL SAFETY MEETING GUIDE
VESSEL GENERAL PERMIT FOR DISCHARGES

This package includes:

- (1) Instructions
- (2) Script
- (3) Copy of Environmental Sensitivities Policy
- (4) VGP Weekly Vessel Inspection Checklist
- (5) Safety Meeting Follow-Up

NOTE! This guide and all the material it contains should be considered suggestions and helpful hints to assist you in conducting your vessel safety meeting. Always feel free to use your own words or description of the material about the subject of this guide.

Steps to take before beginning the Safety Meeting:

- Make sure all the materials listed above are included in this package.
- Review the material before conducting the meeting.
- Review CBC Environmental Sensitivities Policy.
- Review CBC Onboard Best Practices.
- Review VGP Weekly Vessel Inspection Checklist.
- Use the Lesson Plan outline as a guide.
- Ask questions to involve the crew and to assess understanding.
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues.

Once you have completed the meeting:

- Write down any suggestions or opinions.
- Retain the Safety Meeting Guide for future reference.
- **Complete the Safety Meeting Follow-Up Form and return it to the Belle Chasse Office.**
- **Make an entry in the vessel log describing date, time and topic covered during the Safety Meeting.**
- **Record the training in your Turnover Report and request that your relief complete the same training with the oncoming crew.**
- Note: Please contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

VESSEL GENERAL PERMIT FOR DISCHARGES

OBJECTIVES

When your crew has completed this safety meeting they should be able to:

- Define and reinforce CBC's Environmental Sensitivities Policy.
- Understand the requirements of the Weekly Vessel Inspection Checklist.
- Be able to explain the requirements of the weekly/voyage routine vessel inspection, which includes:
 - Are decks clear of trash or debris that may blow or wash overboard?
 - Is any oil or pollutant visible on deck that could be washed overboard?
 - Are all materials on deck stored to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on the deck?
 - Is trash onboard secured or bagged and stowed to prevent it from being blown or washed overboard?
 - Are all scuppers in place in primary containment areas to prevent overboard discharge of oily runoff?
 - Are fuel vents secure and properly contained to prevent overboard discharge?
 - Is fuel containment properly in place to prevent fuel or oil from going overboard?
 - Is the vessel using best management practices to ensure minimum 'Gray Water' overboard discharge?
 - Does the vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate free?
 - Are toxic and hazardous materials properly stored in protected areas of the vessel?
 - Are rudder-bearing seals in good operating order?
 - Is the deck area where rigging is stowed free of oily residue?
 - During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?

INSTRUCTOR TO READ TO THE CREW

This Safety Meeting will review the requirements of the Environmental Protection Agency's Vessel General Permit, or VGP, governing discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The vessel discharges covered by the VGP are listed in the cover memo and may occur in our vessel operations.

CBC's position as a leader in environmental protection in the barge and towing industry can be further strengthened when each employee consistently embraces and exercises the principles of our Environmental Sensitivities Policy. Only if each of us makes the commitment to support the ideas and principles contained in the policy can we fulfill our commitment to protecting the environment. We believe that our unique way of doing business, which is based on a partnership between CBC and our employees, will ensure that the company and all employees take the steps necessary to continue to reduce environmental hazards and eliminate environmental incidents.

Please note that because some of the VGP's requirements for environmental controls, vessel inspections, corrective actions and recordkeeping overlap with practices we have already implemented as part of RCP, we have incorporated those overlapping requirements into our existing safety management system instead of establishing new policies. Our goal is to make sure that we clearly identify requirements imposed by the permit so that you can readily demonstrate to the EPA (or an authorized agent of EPA) that our vessels are in compliance with the VGP, if asked.

CBC's commitment to environmental stewardship runs throughout our organization. We should continually work to eliminate environmental incidents and reduce wastes. All CBC employees are responsible for supporting CBC's Environmental Sensitivities Policy.

As stated in our Environmental Sensitivities Policy, our commitment to continually improve our environmental performance is as follows:

- Environmental protection is a priority in our business planning and operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

WE OBEY THE LAW. Canal Barge is committed to obeying all environmental, safety and health laws and regulations. This commitment helps protect our employees, our customers, our suppliers, our community and our environment. We welcome your ideas on how we can better work together to improve our working relationship with nature.

SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
The waterways of the United States are a shared resource and national asset for everyone.
Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

4 of 7

Weekly Routine Vessel and Tow Inspection Checklist

Vessel Name: _____

Person Conducting Inspection: _____

Vessel Location: _____

Barges in Tow: _____

Weekly or Once Per Voyage (Whichever Is More Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secured or bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily runoff?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel and tow been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

Description of any Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing date, time, and training topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for souging (washing) the boat:

Describe any lessons learned and if their review:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel Attending Meeting (I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.)

_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____
Print Name Signature

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

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Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for sougning the boat:

Describe any lessons learned and how they were reviewed with the crew:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel attending meeting: I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.

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_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____

CANAL BARGE COMPANY, INC.

ENVIRONMENTAL SENSITIVITIES POLICY

CBC's commitment to environmental stewardship runs throughout the organization. We recognize that the waterways we travel are shared, public resources to be preserved and passed on to future generations. We work continually to eliminate all environmental incidents, reduce wastes and reduce and/or manage environmental risks and hazards. All CBC employees are responsible for supporting CBC's environmental policy. Our commitment to continually improve CBC's environmental performance is as follows:

- We will conduct our business in a manner that protects the environment, our employees, our customers, our suppliers and the public.
- Environmental protection is a priority in our business strategy and daily operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We will train our employees to work safely and adhere to all applicable environmental policies and regulations.
- We will maintain and update emergency response plans to ensure maximum preparedness to respond to environmental incidents.
- We will strive to reduce vessel-generated waste and emissions by improving our operating procedures.
- We will work in partnership with our customers and suppliers to enhance the safe transportation and management of cargo residues and cleaning wastes.
- We will actively collaborate with governmental authorities and other stakeholders in creating responsible environmental policies and procedures.
- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
- We will continue to monitor, evaluate and report on our performance as environmental stewards.

Everyone must be involved in order for us to be successful. Environmental protection is a priority in everything we do. We refuse to take shortcuts in our quest to be effective environmental stewards, even when this may require short-term economic sacrifice.

Environmental Stewardship Is Good Business!



Merritt Lane, III

Exhibit I

EPA VESSEL GENERAL PERMIT

CBC ONBOARD BEST MANAGEMENT PRACTICES (BMP)

1. Material Storage (VGP section 2.1.1.)

- Store cargoes and other onboard materials to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or surface water spray. If possible, store such materials in a covered place.
- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept it into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

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If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

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- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

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Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

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- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercom lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

CANAL BARGE COMPANY

DATE: December 6, 2012
TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit for Discharges**

Since 2009, CBC has complied with the U.S. Environmental Protection Agency's (EPA) Vessel General Permit (VGP) for discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

- | | |
|--|--|
| <input type="checkbox"/> Bilge water | <input type="checkbox"/> Rudder bearing lubrication |
| <input type="checkbox"/> Deck wash down and run-off | <input type="checkbox"/> Ballast water |
| <input type="checkbox"/> Cathodic protection (anodes) | <input type="checkbox"/> Anti-fouling leachate from hull coatings |
| <input type="checkbox"/> Elevator pit effluent (retractable pilot house vessels) | <input type="checkbox"/> Fire main systems |
| <input type="checkbox"/> Gray water | <input type="checkbox"/> Refrigeration and air conditioning condensate |

Attached to this training guide you will find two documents: (1) A Safety Meeting Guide and (2) the VGP Weekly Vessel Inspection Checklist along with instructions.

- Use this material to hold a safety meeting with your crew.
- Upon completion of the safety meeting, retain a copy of this meeting guide, including the Follow-Up form, and record this activity in your Turnover Report.
- **All Deck Department employees should record the meeting in their DAR.**
- **Communicate with your relief that s/he must also conduct the VGP training session with his/her crew to ensure that all crew members (on or off), participate in this important training.**
- Continue to conduct VGP weekly inspections and maintain vessel inspection records on board until further notice.

Being familiar with Chapter 2 Environmental Protection of the CBC Operations and Policies and Procedures Manual are examples of the Safety Procedures each employee should follow. Being familiar with policies and procedures is also a requirement of the RCP, our Towing Safety Management System and federal regulations.

Please remind your crewmembers to stay focused on their safety performance. Our goal is the elimination of all incidents and accidents.

PROTECTING THE ENVIRONMENT IS GOOD BUSINESS



Captain Paul Barnes

Attachments

- (1) Safety Meeting Guide—Vessel General Permit For Discharges
- (2) Environmental Sensitivities Policy
- (3) VGP Weekly Vessel Inspection Checklist
- (4) Exhibit I – EPA Vessel General Permit – CBC Onboard Best Management Practices
- (5) Safety Meeting Follow-Up Form

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CANAL BARGE COMPANY
SAFETY MEETING GUIDE
VESSEL GENERAL PERMIT FOR DISCHARGES

This package includes:

- (1) Instructions
- (2) Script
- (3) Copy of Environmental Sensitivities Policy
- (4) VGP Weekly Vessel Inspection Checklist
- (5) Safety Meeting Follow-Up

NOTE! This guide and all the material it contains should be considered suggestions and helpful hints to assist you in conducting your vessel safety meeting. Always feel free to use your own words or description of the material about the subject of this guide.

Steps to take before beginning the Safety Meeting:

- Make sure all the materials listed above are included in this package.
- Review the material before conducting the meeting.
- Review CBC Environmental Sensitivities Policy.
- Review CBC Onboard Best Practices.
- Review VGP Weekly Vessel Inspection Checklist.
- Use the Lesson Plan outline as a guide.
- Ask questions to involve the crew and to assess understanding.
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues.

Once you have completed the meeting:

- Write down any suggestions or opinions.
- Retain the Safety Meeting Guide for future reference.
- **Complete the Safety Meeting Follow-Up Form and return it to the Belle Chasse Office.**
- **Make an entry in the vessel log describing date, time and topic covered during the Safety Meeting.**
- **Record the training in your Turnover Report and request that your relief complete the same training with the oncoming crew.**
- Note: Please contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

VESSEL GENERAL PERMIT FOR DISCHARGES

OBJECTIVES

When your crew has completed this safety meeting they should be able to:

- Define and reinforce CBC's Environmental Sensitivities Policy.
- Understand the requirements of the Weekly Vessel Inspection Checklist.
- Be able to explain the requirements of the weekly/voyage routine vessel inspection, which includes:
 - Are decks clear of trash or debris that may blow or wash overboard?
 - Is any oil or pollutant visible on deck that could be washed overboard?
 - Are all materials on deck stored to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on the deck?
 - Is trash onboard secured or bagged and stowed to prevent it from being blown or washed overboard?
 - Are all scuppers in place in primary containment areas to prevent overboard discharge of oily runoff?
 - Are fuel vents secure and properly contained to prevent overboard discharge?
 - Is fuel containment properly in place to prevent fuel or oil from going overboard?
 - Is the vessel using best management practices to ensure minimum 'Gray Water' overboard discharge?
 - Does the vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate free?
 - Are toxic and hazardous materials properly stored in protected areas of the vessel?
 - Are rudder-bearing seals in good operating order?
 - Is the deck area where rigging is stowed free of oily residue?
 - During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?

INSTRUCTOR TO READ TO THE CREW

This Safety Meeting will review the requirements of the Environmental Protection Agency's Vessel General Permit, or VGP, governing discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The vessel discharges covered by the VGP are listed in the cover memo and may occur in our vessel operations.

CBC's position as a leader in environmental protection in the barge and towing industry can be further strengthened when each employee consistently embraces and exercises the principles of our Environmental Sensitivities Policy. Only if each of us makes the commitment to support the ideas and principles contained in the policy can we fulfill our commitment to protecting the environment. We believe that our unique way of doing business, which is based on a partnership between CBC and our employees, will ensure that the company and all employees take the steps necessary to continue to reduce environmental hazards and eliminate environmental incidents.

Please note that because some of the VGP's requirements for environmental controls, vessel inspections, corrective actions and recordkeeping overlap with practices we have already implemented as part of RCP, we have incorporated those overlapping requirements into our existing safety management system instead of establishing new policies. Our goal is to make sure that we clearly identify requirements imposed by the permit so that you can readily demonstrate to the EPA (or an authorized agent of EPA) that our vessels are in compliance with the VGP, if asked.

CBC's commitment to environmental stewardship runs throughout our organization. We should continually work to eliminate environmental incidents and reduce wastes. All CBC employees are responsible for supporting CBC's Environmental Sensitivities Policy.

As stated in our Environmental Sensitivities Policy, our commitment to continually improve our environmental performance is as follows:

- Environmental protection is a priority in our business planning and operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

WE OBEY THE LAW. Canal Barge is committed to obeying all environmental, safety and health laws and regulations. This commitment helps protect our employees, our customers, our suppliers, our community and our environment. We welcome your ideas on how we can better work together to improve our working relationship with nature.

SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
The waterways of the United States are a shared resource and national asset for everyone.
Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

4 of 7

Weekly Routine Vessel and Tow Inspection Checklist

Vessel Name: _____

Person Conducting Inspection: _____

Vessel Location: _____

Barges in Tow: _____

Weekly or Once Per Voyage (Whichever Is More Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secured or bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily runoff?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel and tow been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

Description of any Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing date, time, and training topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for souging (washing) the boat:

Describe any lessons learned and if their review:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel Attending Meeting (I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.)

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

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Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Print Name Initials

Meeting Conducted by: _____
Print Name Signature

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
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Describe crew best practices for sougning the boat:

Describe any lessons learned and how they were reviewed with the crew:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel attending meeting: I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.

Print Name _____	Initials _____	Print Name _____	Initials _____
Print Name _____	Initials _____	Print Name _____	Initials _____
Print Name _____	Initials _____	Print Name _____	Initials _____
Print Name _____	Initials _____	Print Name _____	Initials _____
Print Name _____	Initials _____	Print Name _____	Initials _____
Print Name _____	Initials _____	Print Name _____	Initials _____

Meeting Conducted by: _____

CANAL BARGE COMPANY, INC.

ENVIRONMENTAL SENSITIVITIES POLICY

CBC's commitment to environmental stewardship runs throughout the organization. We recognize that the waterways we travel are shared, public resources to be preserved and passed on to future generations. We work continually to eliminate all environmental incidents, reduce wastes and reduce and/or manage environmental risks and hazards. All CBC employees are responsible for supporting CBC's environmental policy. Our commitment to continually improve CBC's environmental performance is as follows:

- We will conduct our business in a manner that protects the environment, our employees, our customers, our suppliers and the public.
- Environmental protection is a priority in our business strategy and daily operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We will train our employees to work safely and adhere to all applicable environmental policies and regulations.
- We will maintain and update emergency response plans to ensure maximum preparedness to respond to environmental incidents.
- We will strive to reduce vessel-generated waste and emissions by improving our operating procedures.
- We will work in partnership with our customers and suppliers to enhance the safe transportation and management of cargo residues and cleaning wastes.
- We will actively collaborate with governmental authorities and other stakeholders in creating responsible environmental policies and procedures.
- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
- We will continue to monitor, evaluate and report on our performance as environmental stewards.

Everyone must be involved in order for us to be successful. Environmental protection is a priority in everything we do. We refuse to take shortcuts in our quest to be effective environmental stewards, even when this may require short-term economic sacrifice.

Environmental Stewardship Is Good Business!



Merritt Lane, III

Exhibit I

EPA VESSEL GENERAL PERMIT

CBC ONBOARD BEST MANAGEMENT PRACTICES (BMP)

1. Material Storage (VGP section 2.1.1.)

- Store cargoes and other onboard materials to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or surface water spray. If possible, store such materials in a covered place.
- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept up and put into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

- Maintain the protective hull seal on rudder bearings in good operating order to prevent the leaking of lubricating oil.
- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercom lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

CANAL BARGE COMPANY

DATE: December X, 2013
TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit for Discharges**

Since 2009, CBC has complied with the U.S. Environmental Protection Agency's (EPA) Vessel General Permit (VGP) for discharges incidental to the normal operation of vessels. On December 19, 2013, the VGP expires, but EPA has put out a new one that has mostly the same requirements. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The following is a list of the vessel discharges covered by this permit that may happen in our vessel operations:

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Captain Paul Barnes

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- Ask questions to involve the crew and to assess understanding.
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues.

Once you have completed the meeting:

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VESSEL GENERAL PERMIT FOR DISCHARGES

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SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
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Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

Weekly Routine Vessel and Tow Inspection Checklist

Vessel Name: _____

Person Conducting Inspection: _____

Vessel Location: _____

Barges in Tow: _____

Weekly or Once Per Voyage (Whichever Is More Frequent)

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secured or bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily runoff?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel and tow been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

Description of any

Noncompliance

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: ____/____/____
Month / Day / YearTime Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ NoWas a Log Entry made describing date, time, and training topic? ☐ Yes ☐ NoIs a note concerning this training in your Turnover Report? ☐ Yes ☐ NoDid you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ NoIs conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ NoDid you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ NoDid the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for souging (washing) the boat:

Describe any lessons learned and if their review:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel Attending Meeting (I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.)

Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
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Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
Print Name Initials_____
Print Name Initials

Meeting Conducted by: _____

Print Name

Signature

6a of 7

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing date, time, and training topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Describe crew best practices for sougning the boat:

Describe any lessons learned and how they were reviewed with the crew:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

Personnel attending meeting: I, the undersigned, have thoroughly read the Canal Barge Company Environmental Sensitivities Policy and understand its contents. I was given the opportunity to ask questions about the policy. The policy was explained to my satisfaction, and I understand it is my personal responsibility to support and uphold all its provisions thereby ensuring the company goal of eliminating all accidents and environmental incidents is achieved.

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CANAL BARGE COMPANY, INC. ENVIRONMENTAL SENSITIVITIES POLICY

CBC's commitment to environmental stewardship runs throughout the organization. We recognize that the waterways we travel are shared, public resources to be preserved and passed on to future generations. We work continually to eliminate all environmental incidents, reduce wastes and reduce and/or manage environmental risks and hazards. All CBC employees are responsible for supporting CBC's environmental policy. Our commitment to continually improve CBC's environmental performance is as follows:

- We will conduct our business in a manner that protects the environment, our employees, our customers, our suppliers and the public.
- Environmental protection is a priority in our business strategy and daily operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We will train our employees to work safely and adhere to all applicable environmental policies and regulations.
- We will maintain and update emergency response plans to ensure maximum preparedness to respond to environmental incidents.
- We will strive to reduce vessel-generated waste and emissions by improving our operating procedures.
- We will work in partnership with our customers and suppliers to enhance the safe transportation and management of cargo residues and cleaning wastes.
- We will actively collaborate with governmental authorities and other stakeholders in creating responsible environmental policies and procedures.
- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
- We will continue to monitor, evaluate and report on our performance as environmental stewards.

Everyone must be involved in order for us to be successful. Environmental protection is a priority in everything we do. We refuse to take shortcuts in our quest to be effective environmental stewards, even when this may require short-term economic sacrifice.

Environmental Stewardship Is Good Business!



Merritt Lane, III

Exhibit I

EPA VESSEL GENERAL PERMIT

CBC ONBOARD BEST MANAGEMENT PRACTICES (BMP)

1. Material Storage (VGP section 2.1.1.)

- Store cargoes and other onboard materials to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or surface water spray. If possible, store such materials in a covered place.
- If water draining from storage areas comes in contact with oily materials, you must use dry cleanup methods or absorbents to clean up the wastewater and either store it for onshore disposal, or run it through an oily water separator.

2. Toxic and Hazardous Materials (VGP section 2.1.2.)

- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept up and put into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - Avoid discharging ballast water into federally protected waters.
 - Do not discharge sediment from cleaning of ballast tanks within waters subject to the VGP.
 - Discharge only the minimal amount of water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Rudder Bearing Lubrication Discharge (VGP section 2.2.19.) You must:

- Maintain the protective hull seal on rudder bearings in good operating order to prevent the leaking of lubricating oil.
- Promptly repair any leaks.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.

13. Tow Wire and Intercon Lubrication

While not addressed in the VGP, lubrication is required for proper maintenance of metal tow wires and mechanical coupling devices that connect tugboats and barges to prevent friction that may cause a failure of the line or coupling device. Avoiding such failures is critical to ensuring crew and vessel safety and avoiding the risk of significant environmental harm. If applicable to your vessel, you should take the following actions to avoid discharges of lubrication that create a visible sheen on the water:

- Apply only the amount of lubrication necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication only as often as necessary for proper maintenance of the tow wire or mechanical coupling device.
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- Replace absorbent pads, booms and other containment or cleanup equipment as necessary.
- If discharge of tow-wire or intercom lubrication does produce sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

CANAL BARGE COMPANY

DATE: November 3, 2014
TO: All Captains, Pilots, Engineers and Shore Managers
FROM: Captain Paul Barnes
SUBJECT: **Safety Meeting Guide—Vessel General Permit for Discharges**

For continued compliance with the U.S. Environmental Protection Agency's (EPA) Vessel General Permit (VGP) for discharges incidental to the normal operation of vessels, CBC is required to monitor vessel discharges, inspect vessels, keep records of inspections, take corrective actions and report nonconformities. The following is a list of the vessel discharges covered by VGP that may happen in our vessel operations:

- | | |
|--|--|
| <input type="checkbox"/> Bilge water | <input type="checkbox"/> Oil to Sea Interfaces |
| <input type="checkbox"/> Deck wash down and run-off | <input type="checkbox"/> Ballast water |
| <input type="checkbox"/> Cathodic protection (anodes) | <input type="checkbox"/> Anti-fouling leachate from hull coatings |
| <input type="checkbox"/> Elevator pit effluent (retractable pilot house vessels) | <input type="checkbox"/> Fire main systems |
| <input type="checkbox"/> Gray water | <input type="checkbox"/> Refrigeration and air conditioning condensate |

Attached to this training guide are two documents: (1) A Safety Meeting Guide and (2) the VGP Weekly Vessel Inspection Checklist along with instructions.

- Use this material to hold a safety meeting with your crew.
- **All Deck Department employees should record this training in their DAR.**
- **Communicate with your relief that s/he must also conduct the VGP training session with his/her crew to ensure that all crew members (on or off), participate in this important training.**
- **Continue to conduct VGP weekly inspections and maintain vessel inspection records on board**

Being familiar with Chapter 2 Environmental Protection of the CBC Operations and Policies and Procedures Manual are examples of the Safety Procedures each employee should follow. Being familiar with policies and procedures is also a requirement of the RCP, our Towing Safety Management System and federal regulations.

Upon receipt of this Safety Meeting Guide, the "ON" Captain should use the enclosed materials and to hold a training session with your crew. The "OFF" Captain should repeat this training. Upon completion of this training session, please retain a copy of this meeting guide, including the Follow-Up form, and record this important activity in your Turnover Report.

PROTECTING THE ENVIRONMENT IS GOOD BUSINESS



Captain Paul Barnes

Attachments

- (1) Safety Meeting Guide—Vessel General Permit For Discharges
- (2) Environmental Sensitivities Policy
- (3) VGP Weekly Vessel Inspection Checklist
- (4) Exhibit I – EPA Vessel General Permit – CBC Onboard Best Management Practices
- (5) Safety Meeting Follow-Up Form

CANAL BARGE COMPANY
SAFETY MEETING GUIDE
VESSEL GENERAL PERMIT FOR DISCHARGES

This package includes:

- (1) Instructions
- (2) Script
- (3) Copy of Environmental Sensitivities Policy
- (4) VGP Weekly Vessel Inspection Checklist
- (5) Safety Meeting Follow-Up

NOTE! This guide and all the material it contains should be considered suggestions and helpful hints to assist you in conducting your vessel safety meeting. Always feel free to use your own words or description of the material about the subject of this guide.

Steps to take before beginning the Safety Meeting:

- Make sure all the materials listed above are included in this package.
- Review the material before conducting the meeting.
- Review CBC Environmental Sensitivities Policy.
- Review CBC Onboard Best Practices.
- Review VGP Weekly Vessel Inspection Checklist.
- Use the Lesson Plan outline as a guide.
- Ask questions to involve the crew and to assess understanding.
- Use this Safety Meeting as a forum to discuss any other safety or environmental issues.

Once you have completed the meeting:

- Write down any suggestions or opinions.
- **Please conduct this training in two (2) sessions. The initial session should be completed by the “ON” Captain who is on and the second session should be completed by his/her relief, the “OFF” Captain.**
- Complete the Safety Meeting Follow-Up Form and return it to the Belle Chasse Office.
- Make an entry in the vessel log describing date, time & topic covered during the training.
- Record the training in your Turnover Report and request that your relief complete the same training with the oncoming crew.
- Note: Please contact the Safety Department if you have any questions or suggestions about this Safety Meeting Guide.

VESSEL GENERAL PERMIT FOR DISCHARGES

OBJECTIVES

When your crew has completed this safety meeting they should be able to:

- Define and reinforce CBC's Environmental Sensitivities Policy.
- Understand the requirements of the Weekly Vessel Inspection Checklist.
- Be able to explain the requirements of the weekly/voyage routine vessel inspection, which includes:
 - Are decks clear of trash or debris that may blow or wash overboard?
 - Is any oil or pollutant visible on deck that could be washed overboard?
 - Are all materials on deck stored to minimize the likelihood that they will be washed away, blown overboard, or dissolve after contact with precipitation or water washing on the deck?
 - Is trash onboard secured or bagged and stowed to prevent it from being blown or washed overboard?
 - Are all scuppers in place in primary containment areas to prevent overboard discharge of oily runoff?
 - Are fuel vents secure and properly contained to prevent overboard discharge?
 - Is fuel containment properly in place to prevent fuel or oil from going overboard?
 - Is the vessel using best management practices to ensure minimum 'Gray Water' overboard discharge?
 - Does the vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate free?
 - Are toxic and hazardous materials properly stored in protected areas of the vessel?
 - Are rudder-bearing seals in good operating order?
 - Is the deck area where rigging is stowed free of oily residue?
 - During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?

INSTRUCTOR TO READ TO THE CREW

This Safety Meeting will review the requirements of the Environmental Protection Agency's Vessel General Permit, or VGP, governing discharges incidental to the normal operation of vessels. The VGP provides specific requirements for monitoring vessel discharges, inspecting vessels, keeping records of inspections, taking corrective actions and reporting nonconformities. The vessel discharges covered by the VGP are listed in the cover memo and may occur in our vessel operations.

CBC's position as a leader in environmental protection in the barge and towing industry can be further strengthened when each employee consistently embraces and exercises the principles of our Environmental Sensitivities Policy. Only if each of us makes the commitment to support the ideas and principles contained in the policy can we fulfill our commitment to protecting the environment. We believe that our unique way of doing business, which is based on a partnership between CBC and our employees, will ensure that the company and all employees take the steps necessary to continue to reduce environmental hazards and eliminate environmental incidents.

Please note that because some of the VGP's requirements for environmental controls, vessel inspections, corrective actions and recordkeeping overlap with practices we have already implemented as part of RCP, we have incorporated those overlapping requirements into our existing safety management system instead of establishing new policies. Our goal is to make sure that we clearly identify requirements imposed by the permit so that you can readily demonstrate to the EPA (or an authorized agent of EPA) that our vessels are in compliance with the VGP, if asked.

CBC's commitment to environmental stewardship runs throughout our organization. We should continually work to eliminate environmental incidents and reduce wastes. All CBC employees are responsible for supporting CBC's Environmental Sensitivities Policy.

As stated in our Environmental Sensitivities Policy, our commitment to continually improve our environmental performance is as follows:

- Environmental protection is a priority in our business planning and operations.
- We will hold all levels of our work force primarily responsible for preventing environmental incidents.
- Working safely and complying with all federal, state and local regulations governing environmental protection is a condition of employment.
- We train our employees to work safely and adhere to all environmental policies and regulations.
- We strive to reduce vessel-generated waste and emissions by improving our operating practices and procedures.
- We will continue to monitor, evaluate and, where appropriate, improve and report our performance in environmental stewardship.

WE OBEY THE LAW. Canal Barge is committed to obeying all environmental, safety and health laws and regulations. This commitment helps protect our employees, our customers, our suppliers, our community and our environment. We welcome your ideas on how we can better work together to improve our working relationship with nature.

SUMMARY

**Prevention of environmental incidents and protecting the environment is good business.
The waterways of the United States are a shared resource and national asset for everyone.
Towboaters Are Environmentalists.**

**PROTECT YOUR WATERWAYS
YOU CAN MAKE A DIFFERENCE**

4 of 7

Weekly Routine Vessel and Tow Inspection Checklist

CBC 0130

Vessel Name: _____

Person Conducting Inspection: _____

Vessel Location: _____

Barges in Tow: _____

**Weekly or Once Per Voyage
(Whichever Is More Frequent)**

Y or N

Are deck area's clear of trash or debris that may blow or wash overboard?		
Is any oil or pollutant visible on deck that could be washed overboard?		
Are all materials on deck stored as to minimize the likelihood that they will be washed away, blown overboard or dissolve after contact with precipitation or water washing on deck?		
Is trash on board secured or bagged and stowed as to prevent being blown or washed overboard?		
Are all scuppers in place to prevent overboard discharge of oily runoff?		
Is the fuel manifold and vent area free of any oily residue that could be washed overboard?		
Is the vessel using best management practices to ensure minimal "Gray Water" overboard discharge?		
Does vessel use approved cleaners and detergents that are biodegradable, non-toxic and phosphate-free?		
Are toxic and hazardous materials properly stowed in protected areas of the vessel?		
Are rudder bearing seals in good operating order?		
Is deck area where rigging is stowed free of oily residue?		
During each visual watch monitoring that occurred the previous week, has the water around and behind the vessel and tow been visually monitored for visible sheens, dust, chemicals, abnormal discoloration, foaming or other indications of pollutants originating from the vessel?		

**Description of any
Noncompliance**

Date

Time

Corrective Action Taken (if any)

Initials

Date: _____

Time: _____

Master Signature: _____

Canal Barge Company
Safety Meeting Record
Vessel General Permit For Discharges

Vessel/Facility _____

Date: _____ / _____ / _____
Month / Day / Year

Time Started: _____ Time Ended: _____ Materials Listed on cover page rcvd? ☐ Yes ☐ No

Safety Meeting Information (please provide an explanation for any no answers):

Did the crew participate? ☐ Yes ☐ No

Was a Log Entry made describing date, time, and training topic? ☐ Yes ☐ No

Is a note concerning this training in your Turnover Report? ☐ Yes ☐ No

Did you locate and review the VGP Weekly Vessel Inspection Checklist? ☐ Yes ☐ No

Is conducting your weekly inspection part of your ongoing vessel and tow inspection routine? ☐ Yes ☐ No

Did you retain the vessel inspection checklist records onboard your vessel? ☐ Yes ☐ No

Did the deck crew log the meeting in their DAR book? ☐ Yes ☐ No

Did the review of this Safety Topic indicate the need for additional training? ☐ Yes ☐ No

Describe below.

Describe crew best practices for souging (washing) the boat:

Describe any lessons learned and if their review:

Provide any comments or suggestions concerning the Safety Meeting Guide and lesson materials (include any comments on "no" answers here):

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_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____
Print Name Signature

Canal Barge Company
Safety Meeting Record
Topic: Vessel General Permit For Discharges

Vessel/Facility _____

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_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials
_____ Print Name	_____ Initials	_____ Print Name	_____ Initials

Meeting Conducted by: _____

CANAL BARGE COMPANY, INC.

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- We will be proactive and sensitive in regard to environmental concerns of the public and private sectors.
- We will continue to monitor, evaluate and report on our performance as environmental stewards.

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Merritt Lane, III

Exhibit I

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- You must store toxic and hazardous materials in sealed containers that are constructed of a suitable material, labeled and secured, unless doing so would interfere with vessel operations or safety.
 - Store containers in protected areas of the vessel.
 - Do not overfill containers.
 - Do not mix incompatible wastes.
 - Minimize the containers' exposure to ocean spray or precipitation.
 - Do not jettison containers.
- If you must discharge toxic or hazardous materials for safety reasons, document the incident as required in the Recordkeeping section below.

3. Fuel Spills/Overflows (VGP section 2.1.3.)

- Train the crew responsible for fueling operations in methods to minimize spills.
- Conduct all fueling operations using control measures designed to minimize spills and ensure prompt cleanup if they occur.
- Do not overfill fuel tanks.
- If your vessel has air vents, use containment to prevent fuel or oil from overflowing into surrounding waters.

4. Deck Washdown and Runoff (VGP section 2.2.1.)

You must avoid the introduction of on-deck debris, garbage, residue and spills into deck washdown and runoff discharges. Discharges from deck washdowns must be free from floating solids, foam, halogenated phenol compounds, and dispersants, or surfactants. You should take the following steps to minimize the discharge of contaminants into the water from deck washdown and runoff:

- Load cargo in a manner to minimize cargo spillage on deck gunnels.
 - If cargo does spill, it should be swept up and put into the hopper, into coamings or placed in a bag or waste container.
- Maintain the topside surface so that a minimum of rust and topside preservation materials (such as cleaning products, paint chips and non-skid material fragments) is discharged during washdown.
 - Sweep up rust and other materials into a bag or waste container.
- Clear decks of debris, garbage, cargo residue and spills before:
 - deck washdowns
 - departing from port
- When possible, consider the use of environmentally acceptable lubricants in above-deck equipment
- Towing vessels and tank barges must comply with applicable Coast Guard regulations contained in 33 CFR part 155 Subparts B and C regarding discharges of oil.
- When required by their class societies, tank barges must be fitted with, and use, perimeter spill rails and scuppers.
- When washing down the deck, use cleaners and detergents that are:
 - non-toxic
 - phosphate-free
 - biodegradable
 - minimally caustic or non-caustic
- Minimize deck washdowns while in port.

5. Bilgewater (VGP section 2.2.2.) You must either:

- Dispose of bilgewater to a reception facility and document the date and amount of bilgewater so discharged or
- Treat bilgewater with an approved oily water separator and discharge it in accordance with 33 CFR 151.10.

6. Ballast Water (VGP section 2.2.3.)

If your barge or towing vessel is equipped with ballast tanks, you must comply with applicable Coast Guard regulations for ballast water management, exchange and discharge contained in 33 CFR parts 151 and 401. In addition, you must also:

- Train your crew on ballast water and sediment management and treatment procedures applicable to your vessel and retrain them promptly in the event of a significant change in ballast water management practices or the installation of ballast water treatment technology.
- Incorporate into your existing Coast Guard-required ballast water management plan the following requirements:
 - A written training plan describing the training to be provided to your crew. Keep a record of the date of training provided to each crew member.

- An outline of how you will meet the mandatory ballast water management practices and the ballast water numeric discharge limits (if applicable) of the VGP described below.
- Avoid discharging or taking up ballast water into federally protected waters, areas where sediment is stirred up, areas near sewage outfalls, and in darkness
- Clean your ballast tanks on a regular basis.
- Not discharge sediment from cleaning of ballast tanks within waters subject to the VGP
- When feasible and safe, use your ballast water pumps instead of gravity draining to empty your ballast water tanks.
- Discharge only the minimal amount of ballast water essential for vessel operations while in waters subject to the VGP.

7. Elevator Pit Effluent (VGP section 2.2.11.) (Retractable Pilot House)

If your barge or towing vessel is equipped with an elevator, you must ensure that elevator pit effluent drains into the bilge and is handled in accordance with the BMP for bilgewater above.

8. Firemain Systems (VGP section 2.2.12.)

Discharging the firemain system is necessary in order to ensure the ability of the vessel and its crew to respond effectively in an emergency. You should discharge the firemain system only to the extent necessary to accomplish the following purposes:

- During drills and training to ensure that the crew is prepared to use the system during an emergency.
- During testing and maintenance of the equipment to ensure that it is ready for use in an emergency.
- As required by the Coast Guard in order to demonstrate that the equipment is ready for use in an emergency.

9. Graywater (VGP section 2.2.15.)

Towing vessels and barges do not have holding tanks for the storage of graywater. You must develop policies and procedures to minimize the production of graywater and the introduction of contaminants into graywater that will be discharged into the water. These policies and procedures should include:

- Using shoreside washroom, kitchen and laundry facilities when practicable when a vessel is at the dock;
- Delay laundry and scullery activities and restrict the length of showers when a vessel is at the dock;
- Consider the use of high efficiency faucets and showerheads;
- Repairing leaky fixtures promptly;
- Using sinks, showers, washing machines, etc. in accordance with manufacturers' recommendations;
- Educating crewmembers on steps to be taken to reduce the production and contamination of graywater and posting signs on the vessel to remind the crew of these actions;
- Removing as much food and oil as possible before rinsing dishes and preventing cooking oil from going down the sink;
- Using soaps and detergents that are phosphate-free and non-toxic; and,
- Considering additional measures to reduce graywater production and discharge in nutrient-impaired waters, such as the Chesapeake Bay and Puget Sound. A complete list of nutrient-impaired waters can be found on the EPA Web site.

10. Refrigeration and Air Condensate Discharge (VGP section 2.2.18.)

You must not allow refrigeration and air condensate discharge to come into contact with oily or toxic materials. You should:

- Maintain the deck free of oil and toxic materials in accordance with the BMP for deck washdown and runoff above, to avoid contamination of refrigeration and air condensate discharge into the water.
- Handle any waste streams that drain to the bilge in accordance with the BMP for bilgewater above.

11. Oil-to-Sea Interfaces (VGP Part 2.2.9)

- Maintain protective seals on rudder bearings, stern tubes and controllable pitch propellers in good operating order to prevent the leaking of hydraulic oil or other oils.
- Promptly repair any leaks.
- Apply only the amount of lubrication necessary for proper maintenance of the tow wire
- Apply lubrication only as often as necessary for proper maintenance of the tow wire
- Apply lubrication in a manner that minimizes drips and spills and promptly clean up any drips or spills that occur.
- After applying lubrication to wire rope, wipe down the equipment thoroughly to remove excess lubricant unless doing so is unsafe.
- Replace absorbent pads, booms and other containment or clean-up equipment as necessary.
- If discharge of tow wire or intercon lubrication does produce a sheen, report it promptly in accordance with 40 CFR parts 117 and 302.

12. Vessel-Specific Requirements for Barges (VGP section 5.4.)

If you operate barges (including hopper, deck and tank barges), you must:

- Minimize the contact of below-deck condensation with oily or toxic materials, and any materials containing hydrocarbon.
- Visually inspect void spaces or wing tanks to ensure that no oil is present before pumping out the void or tank.
- When pumping, position the pump a few inches from the bottom of the tank and adjust the suction and hoses to minimize contact with any solids in the bottom of the tank.
- Monitor pumping operations to ensure that no visible sheen is produced in the water.⁵ If a sheen is produced, take corrective action and document the occurrence in accordance with the Corrective Actions and Recordkeeping requirements below.
- Clean cargo residue from cargo tanks before washing the cargo tank and discharging wash water overboard.

In addition, if you operate tank barges, you must:

- Equip tank barges with spill rails if required by the barge's class society.
- Ensure that scuppers are plugged before commencing cargo operations and keep scuppers plugged until any discharge or residue resulting from cargo operations is cleaned up.